

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

*Jaylynn Dean v. Uber Techs., Inc.*,  
N.D. Cal. No. 23-cv-06708  
D. Ariz. No. 25-cv-4276

**DECLARATION OF ANDREW R.  
KAUFMAN IN SUPPORT OF  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
FILED UNDER SEAL**

I, Maya R. Kalonia, declare:

1. I am an attorney in the law firm of Girard Sharp LLP, and counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of the State Bars of Wisconsin and New York and am admitted to practice *pro hac vice* before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. Because the materials at issue were designated by Uber as "CONFIDENTIAL" and /or "HIGHLY CONFIDENTIAL", Plaintiff filed the following under seal:

Document	Description	Designating Party
[Unredacted] Plaintiff's Motion	Portion of briefing referring to documents designated highly confidential and confidential	Uber
Exhibit C	December 4, 2025, Declaration of Todd Gaddis	Uber
Exhibit D	October 24, 2025, Rebuttal Expert Report of Vida Thomas	Uber
Exhibit H	Excerpts of Document bates stamped UBER-MDL3084-BW-00006299	Uber

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on December 12, 2025 in Milwaukee, Wisconsin.

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4 /s/ Andrew R. Kaufman  
5 Andrew R. Kaufman  
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